

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**DECLARATION OF MADHU POCHA, ESQ. IN SUPPORT OF AAFAF'S RESPONSE  
TO AMBAC'S MOTION TO COMPEL THIRD-PARTY DISCOVERY FROM  
MILLIMAN, INC.**

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

I, Madhu Pocha, Esq., under 28 U.S.C. § 1746, submit this declaration in support of  
*AAFAF's Response to Ambac's Motion to Compel Third-Party Discovery from Milliman, Inc.*<sup>2</sup>:

1. I am a partner in the law firm O'Melveny & Myers LLP, attorneys for AAFAF in this proceeding.

2. I submit this declaration to place before the Court true and correct copies of documents cited in *AAFAF's Response to Ambac's Motion to Compel Third-Party Discovery from Milliman, Inc.*, filed contemporaneously herewith.

3. Attached hereto as **Exhibit A** is a true and correct copy of the July 8, 2019 letter from the Government Parties<sup>3</sup> to Ambac.

4. Attached hereto as **Exhibit B** is a true and correct copy of the October 21, 2020 letter from the Government Parties to Ambac.

5. Attached hereto as **Exhibit C** is a true and correct copy of the March 30, 2021 letter from the Government Parties to Ambac.

6. Attached hereto as **Exhibit D** is a true and correct copy of the April 9, 2021 letter from the Government Parties to Ambac.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 11, 2021 at Los Angeles, California.

/s/ Madhu Pocha  
Madhu Pocha

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<sup>2</sup> Capitalized terms not defined in this declaration shall have the meaning ascribed to them in *AAFAF's Response to Ambac's Motion to Compel Third-Party Discovery from Milliman, Inc.*, filed contemporaneously with this declaration.

<sup>3</sup> The Government Parties are the Financial Oversight and Management Board for Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and AAFAF.